

1 KEVIN V. RYAN (CSBN 118321)
2 United States Attorney

3
4
5
6
7
8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,) No.:
14 Plaintiff,)
15) VIOLATIONS: 18 U.S.C. § 1343 — Wire
16 v.) Fraud (41 Counts); 18 U.S.C. § 1341 —
17) Mail Fraud (4 Counts); 18 U.S.C. §
18 TONY J. DANILOO,) 1956(a)(1)(A)(I) — Financial
19 Defendant.) Transactions to Promote Unlawful
20) Activity (77 Counts)
21) SAN FRANCISCO VENUE

22 INDICTMENT

23 The Grand Jury charges:

24 BACKGROUND

25 At all times relevant to this Indictment:

26 1. DreamLife Investments Inc., doing business as DreamLife Financial
27 (“DreamLife”), was a company that was based in Modesto, California, and maintained
28 numerous branch offices. DreamLife purported to provide mortgages to prospective
homeowners with poor credit ratings.

2. Defendant TONY J. DANILOO (“DANILOO”) was the President, CEO
and co-founder of DreamLife.

INDICTMENT

1 3. Residential Credit Corporation (“RCC”) was a mortgage brokerage
2 company that was based in Westminster, California, and maintained numerous branch
3 offices. From approximately December 2000 to January 2002, DANILOO served as
4 branch manager for RCC’s office in Dublin, California.

5 THE SCHEME TO DEFRAUD

6 4. Between in or around December 2000 and December 2004, in the Northern
7 District of California and elsewhere, the defendant,

8 TONY J. DANILOO

9 did knowingly and intentionally devise a material scheme and plan to defraud, and to
10 obtain money and property by means of materially false and fraudulent promises,
11 representations and statements, well knowing that the promises, representations and
12 statements were materially false when made.

13 5. It was part of the scheme to defraud that DANILOO assisted homeowners
14 in refinancing their homes, and then embezzled for his own use cash that had been
15 intended to satisfy his clients’ previous mortgages and other debts. The scheme to
16 defraud involved two different sets of victim homeowners: (A) clients of RCC; and (B)
17 clients of DreamLife.

18 A. *Scheme to Defraud Clients at Residential Credit Corporation*

19 6. While employed as a branch manager at RCC from 2000 until 2002,
20 DANILOO purported to help clients refinance their homes and properties to raise cash for
21 the clients’ needs. Specifically, DANILOO purported to assist RCC clients in obtaining
22 new mortgage loans and taking equity out of the properties in the form of cash payments
23 to the clients, in order to help the clients extinguish debts, such as unpaid balances on
24 credit cards and automobile financing.

25 7. It was part of the scheme to defraud that after the funding of newer
26 loans—but before disbursements were made out of escrow—DANILOO would cause the
27 escrow company to alter the payout instructions to enable DANILOO to embezzle a
28 portion of the cash intended for the clients.

1 8. Typically, DANILOO embezzled his clients' money by forging letters from
2 the clients falsely instructing escrow officers that some funds from the refinancing should
3 be made payable to accounts controlled by DANILOO. These letters were materially
4 false, in that the clients had no knowledge that such letters had gone out in their name and
5 had not authorized personal payments to DANILOO.

6 9. It was further part of the scheme to defraud that DANILOO concealed his
7 fraud through "lulling payments" to previous clients, using funds diverted from funds
8 belonging to newer clients.

9 10. Altogether, DANILOO improperly diverted funds from at least seventeen
10 RCC clients, redirecting a total of approximately \$600,000 of loan funds intended for
11 those clients to DANILOO's then-personal bank account at Union Bank of California.
12 The RCC clients intended that these funds be used either to pay off the clients' debts, or
13 to provide the clients with cash payments. Instead, DANILOO usurped the funds for his
14 own personal gain.

15 ***B. Scheme to Defraud Clients and Lenders at DreamLife***

16 11. In 2003, DANILOO co-founded his own mortgage brokerage company,
17 where he continued to siphon off for his own use escrow funds that belonged to his
18 clients.

19 12. DANILOO's company was first named Source Financial of Turlock. In
20 2004, the name was changed to DreamLife Investments, Inc., doing business as
21 DreamLife Financial (hereinafter "DreamLife"). DreamLife was based in Modesto,
22 California, but operated as many as seven branch offices throughout the central California
23 valley. DANILOO served as the CEO and president of DreamLife.

24 13. DreamLife maintained an Internet site and also advertised on the radio and
25 on television. DreamLife purported to be a mortgage-brokerage company that arranged
26 loans for home buyers and people refinancing their existing home loans. Its target market
27 included low-income and minority clients who aspired to be homeowners but had poor
28 credit histories.

1 14. It was part of the scheme to defraud that DANILOO tampered with his
2 clients' financial records by inflating their income levels and purporting to document
3 these false income levels by inserting into their files phony documents. The phony
4 documents that DANILOO inserted into his clients' loan files included: forged and
5 altered bank records; forged letters from Certified Public Accountants that purported to
6 confirm clients' income; forged documents with names of mortgage brokers who, in fact,
7 had never involved in the transaction at hand; forged, altered, and/or false tax documents.

8 15. The false representations involving income levels, and the forged and
9 altered documents inserted in clients' loan files, were material to lenders because they
10 caused DANILOO's clients to qualify for loans for which the clients would not have
11 otherwise qualified. Approximately 90 percent of the loans that DreamLife processed
12 involved materially false representations and materially false documentation.

13 16. It was part of the scheme to defraud that DANILOO embezzled for his
14 personal use funds from clients' refinances that were supposed to pay off the clients' old
15 mortgage loans.

16 17. In mortgage refinancing, escrow files typically contain a demand letter from
17 the original lender stating the amount owed on the old mortgage loan. As part of the
18 closing of typical refinances, the final settlement statement contemplates payments to the
19 original lender to extinguish the old mortgage loan.

20 18. It was part of the scheme to defraud that in numerous refinancing
21 transactions involving DreamLife clients, DANILOO placed in each of his clients'
22 escrow files a forged letter. Each forged letter was materially false in that it (1) falsely
23 showed a zero balance for the old mortgage loans, and (2) falsely stated that the old
24 mortgage loans had been Paid Outside of Closing ("POC"). DANILOO then caused the
25 final statement to direct that the funds be deposited into various accounts controlled by
26 DANILOO, which he then moved to other accounts, ultimately diverting much of the
27 cash for his own personal use.

28 19. Because the old mortgage loans were never paid, many were placed in

1 default status, sometimes triggering foreclosure proceedings. When clients confronted
2 DANILOO about receiving notices about failure to make payments on the old mortgage
3 loans, DANILOO made materially false statements to the clients, blaming the problem on
4 others.

5 20. DANILOO further made numerous payments toward the unpaid mortgages
6 of clients who complained. DANILOO made these “lulling payments” so that his clients
7 would not suspect that DANILOO had embezzled the money that the clients had intended
8 be used to pay off the old mortgages. None of the DreamLife clients ever intended that
9 their settlement funds be diverted by DANILOO for his personal use.

10 21. In total, DANILOO embezzled for his own personal use more than \$4.5
11 million in funds intended for, and belonging to, DreamLife clients.

12 22. Of the funds diverted from DreamLife clients, DANILOO used some of the
13 money on luxury items for her personal use, such as numerous luxury automobiles.
14 DANILOO also used some of his clients’ funds to expand his business, opening
15 additional DreamLife offices, purchasing advertising for DreamLife, and making highly-
16 publicized bids and donations in order to raise DreamLife’s profile.

17 23. Among DANILOO’s attempts to use diverted funds to acquire publicity for
18 his business was a \$1 million pledge to the athletic department at California State
19 University at Stanislaus, in exchange for the university renaming its athletic arena
20 “DreamLife Arena.” In 2004, DreamLife was also a finalist for naming rights of the San
21 Francisco 49ers’ football stadium at Candlestick Point.

22 //

23 //

24 //

25 //

26 //

27 //

28 //

COUNTS ONE through FORTY-ONE: 18 U.S.C. § 1343 (Wire Fraud)

24. Paragraphs 1 through 23 are realleged as if fully set forth herein.

25. On or about the following dates, in the Northern District of California and elsewhere, for the purpose of executing the above-described schemes to defraud, the defendant,

TONY J. DANILOO,

did knowingly transmit and cause to be transmitted the following wire communications in interstate commerce:

Count	Date	Wire Communication	From	To
1	8/31/01	Wire transfer of \$208,594	Bank of New York, NY	New Century Title, Pleasanton, CA
2	9/4/01	Wire transfer of \$146,350	Bankers Trust Co., NY	New Century Title, Pleasanton, CA
3	5/21/03	Wire transfer of \$97,770	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
4	5/30/03	Wire transfer of \$299,395.34	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
5	8/13/03	Wire transfer of \$222,989.00	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
6	10/8/03	Wire transfer of \$253,096.89	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
7	10/8/03	Wire transfer of \$39,550.00	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
8	10/20/03	Wire transfer of \$24,250.50	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
9	12/22/03	Wire transfer of \$64,326.40	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
10	1/2/04	Wire transfer of \$265,665.98	Union Bank, Modesto, CA	Citibank, Dublin, CA
11	1/5/04	Wire transfer of \$47,088.91	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
12	3/1/04	Wire transfer of \$109,124.72	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA
13	4/2/04	Wire transfer of \$221,696.79	Fremont Bank, Fremont, CA.	Citibank, Dublin, CA

Count	Date	Wire Communication	From	To
14	5/3/04	Wire transfer of \$736,049.92	Union Bank, Modesto, CA	Citibank, Dublin, CA
15	6/25/04	Wire transfer of \$7,156.00	Union Bank, Modesto, CA	Citibank, Dublin, CA
16	6/30/04	Wire transfer of \$495,318.48	Union Bank, Modesto, CA	Citibank, Dublin, CA
17	7/1/04	Wire transfer of \$150,857.23	Union Bank, Modesto, CA	Citibank, Dublin, CA
18	7/30/04	Wire transfer of \$139,868.72	Union Bank, Modesto, CA	Citibank, Dublin, CA
19	8/4/04	Wire transfer of \$60,280.31	Union Bank, Modesto, CA	Citibank, Dublin, CA
20	8/4/04	Wire transfer of \$243,871.24	Union Bank, Modesto, CA	Citibank, Dublin, CA
21	8/5/04	Wire transfer of \$155,612.14	Union Bank, Modesto, CA	Citibank, Dublin, CA
22	9/1/04	Wire transfer of \$27,809.19	Union Bank, Modesto, CA	Citibank, Dublin, CA
23	9/1/04	Wire transfer of \$205,270.15	Union Bank, Modesto, CA	Citibank, Dublin, CA
24	9/1/04	Wire transfer of \$35,500.23	Union Bank, Modesto, CA	Citibank, Dublin, CA
25	9/1/04	Wire transfer of \$185,165.07	Union Bank, Modesto, CA	Citibank, Dublin, CA
26	9/2/04	Wire transfer of \$192,090.65	Union Bank, Modesto, CA	Citibank, Dublin, CA
27	9/2/04	Wire transfer of \$20,284.45	Union Bank, Modesto, CA	Citibank, Dublin, CA
28	9/28/04	Wire transfer of \$290,175.18	Union Bank, Modesto, CA	Citibank, Dublin, CA
29	9/28/04	Wire transfer of \$28,355.91	Union Bank, Modesto, CA	Citibank, Dublin, CA
30	9/28/04	Wire transfer of \$67,478.31	Union Bank, Modesto, CA	Citibank, Dublin, CA
31	9/29/04	Wire transfer of \$30,637.57	Union Bank, Modesto, CA	Citibank, Dublin, CA
32	9/29/04	Wire transfer of \$200,749.35	Union Bank, Modesto, CA	Citibank, Dublin, CA

Count	Date	Wire Communication	From	To
33	10/6/04	Wire transfer of \$41,694.20	Union Bank, Modesto, CA	Citibank, Dublin, CA
34	10/6/04	Wire transfer of \$243,606.01	Union Bank, Modesto, CA	Citibank, Dublin, CA
35	10/6/04	Wire transfer of \$129,554.28	Union Bank, Modesto, CA	Citibank, Dublin, CA
36	11/1/04	Wire transfer of \$49,489.37	Union Bank, Modesto, CA	Citibank, Dublin, CA
37	11/1/04	Wire transfer of \$193,739.83	Union Bank, Modesto, CA	Citibank, Dublin, CA
38	11/3/04	Wire transfer of \$147,006.64	Union Bank, Modesto, CA	Citibank, Dublin, CA
39	11/5/04	Wire transfer of \$86,224.26	Union Bank, Modesto, CA	Citibank, Dublin, CA
40	11/5/04	Wire transfer of \$341,497.77	Union Bank, Modesto, CA	Citibank, Dublin, CA
41	12/7/04	Wire transfer of \$71,785.18	Union Bank, Modesto, CA	Citibank, Dublin, CA

All in violation of Title 18, United States Code, Section 1343.

COUNTS FORTY-TWO THROUGH FORTY-FIVE: 18 U.S.C. § 1341 (Mail Fraud)

26. Paragraphs 1 through 23 are realleged as if fully set forth herein.

27. On or about the dates set forth below, in the Northern District of California and elsewhere, for the purpose of executing, and in furtherance of, a scheme and artifice to defraud, and in attempting to do so, the defendant,

TONY J. DANILOO,

did knowingly cause the matters and items listed below to be sent and delivered by private and commercial interstate carrier according to the directions thereon:

Count	Date	Mailing	From	To
42	9/7/01	Escrow check for \$176,979.18 (via Federal Express)	New Century Title Company	ABN Amro Mortgage Group
43	10/8/01	Escrow check for \$1,463.66 (via Federal Express)	New Century Title Company	American General Finance
44	10/24/01	Escrow check for \$143,111.62 (via Federal Express)	New Century Title Company	First Nationwide Mortgage
45	10/24/01	Escrow check for \$101,156.73 (via Federal Express)	New Century Title Company	Internal Revenue Service

All in violation of Title 18, United States Code, Section 1341.

COUNTS FORTY-SIX THROUGH ONE HUNDRED TWENTY-TWO: 18 U.S.C. § 1956(a)(1)(A)(I) (Financial Transactions to Promote Unlawful Activity)

28. Paragraphs 1 through 27 are realleged as if fully set forth herein.

29. On or about the dates set forth below, in the Northern District of California and elsewhere, the defendant,

TONY J. DANILOO,

did knowingly conduct financial transactions, in and affecting interstate commerce, with the proceeds of a specified unlawful activity, to wit: wire fraud, in violation of 18 U.S.C. § 1343, and mail fraud, in violation of 18 U.S.C. § 1341, with the intent to promote the carrying on of the specified unlawful activity, as follows:

Count	Date	Transaction	From	To
46	1/7/04	Bank transfer of \$1,214.25 (lulling payment)	Citibank, Dublin, CA	Wells Fargo
47	1/12/04	Debit card charge of \$2,688.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
48	1/13/04	Check for \$3,562.50 (lulling payment)	Citibank, Dublin, CA	Ocwen Federal Bank Mortgage
49	1/26/04	Check for \$1,540.17 (lulling payment)	Citibank, Dublin, CA	Accredited Home Lenders
50	1/26/04	Check for \$1,540.17 (lulling payment)	Citibank, Dublin, CA	Accredited Home Lenders
51	2/5/04	Debit card charge of \$2,200.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
52	2/13/04	Check for \$3,500.00	Citibank, Dublin, CA	Escrow Officer A
53	3/11/04	Debit card charge of \$3,400.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
54	3/23/04	Check for \$1,723.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
55	4/5/04	Check for \$30,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
56	4/6/04	Wire transfer of \$10,000.00	Citibank, Dublin, CA	Escrow Officer A
57	4/8/04	Check for \$4,000	Citibank, Dublin, CA	Escrow Officer A
58	4/13/04	Check for \$13,602.15 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
59	4/13/04	Check for \$10,715.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
60	4/13/04	Check for \$2,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
61	4/16/04	Check for \$7,981.50 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
62	4/19/04	Debit card charge of \$3,400.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
63	4/20/04	Check for \$9,934.65 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial

Count	Date	Transaction	From	To
64	4/22/04	Check for \$16,928.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
65	5/3/04	Check for \$30,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
66	5/7/04	Check for \$35,016.24 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
67	5/10/04	Check for \$35,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
68	5/14/04	Debit card charge of \$3,400.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
69	5/14/04	Check for \$20,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
70	5/18/04	Check for \$50,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Wardens
71	5/21/04	Debit card charge of \$3,400.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
72	5/21/04	Check for \$4,868.81 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
73	5/21/04	Check for \$1,802.19 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
74	6/2/04	Check for \$34,180.76 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
75	6/4/04	Debit card charge of \$3,400.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
76	6/11/04	Debit card charge of \$3,400.00 (DreamLife business expense)	Citibank, Dublin, CA	The Loan Page.Com
77	6/11/04	Check for \$4,868.81 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
78	6/11/04	Check for \$1,802.19 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
79	6/17/04	Check for \$20,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
80	6/30/04	Check for \$50,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
81	7/16/04	Check for \$50,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial

Count	Date	Transaction	From	To
82	7/20/04	Check for \$4,868.81 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
83	7/20/04	Check for \$1,802.19 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
84	8/2/04	Check for \$63,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
85	8/6/04	Check for \$57,550.92 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
86	8/12/04	Check for \$4,868.81 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
87	8/12/04	Check for \$1,802.19 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
88	8/13/04	Check for \$48,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
89	8/16/04	Check for \$45,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
90	8/27/04	Bank transfer of \$3,666.87 (lulling payment)	Citibank, Dublin, CA	New Century Mortgage
91	8/30/04	Check for \$6,500.00 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
92	8/31/04	Check for \$5,210.14 (lulling payment)	Citibank, Dublin, CA	Beneficial Mortgage
93	9/1/04	Check for \$34,200.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
94	9/2/04	Check for \$48,250.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
95	9/2/04	Check for \$7,166.96 (lulling payment)	Citibank, Dublin, CA	New Century Mortgage
96	9/3/04	Check for \$5,000.00 (lulling payment)	Citibank, Dublin, CA	Private Lender A
97	9/7/04	Check for \$15,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Townsend Direct
98	9/7/04	Check for \$60,284.00 (DreamLife business expense)	Citibank, Dublin, CA	Wardens
99	9/14/04	Check for \$4,868.81 (lulling payment)	Citibank, Dublin, CA	Washington Mutual

Count	Date	Transaction	From	To
100	9/14/04	Check for \$1,802.19 (lulling payment)	Citibank, Dublin, CA	Washington Mutual
101	9/15/04	Check for \$60,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
102	9/17/04	Check for \$25,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Law Firm A
103	9/17/04	Check for \$37,500.00 (DreamLife business expense)	Citibank, Dublin, CA	Townsend Direct
104	9/29/04	Check for \$75,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Townsend Direct
105	9/30/04	Check for \$71,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
106	10/5/04	Check for \$4,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Producer of TV advertisement
107	10/8/04	Check for \$60,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
108	10/12/04	Check for \$22,353.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
109	10/13/04	Check for \$111,997.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
110	10/13/04	Bank transfer of \$3,571.23 (lulling payment)	Citibank, Dublin, CA	New Century Mortgage
111	10/15/04	Bank transfer of \$62,783.49 (lulling payment)	Citibank, Dublin, CA	Chase Bank
112	10/15/04	Bank transfer of \$206,092.59 (lulling payment)	Citibank, Dublin, CA	Option One Mortgage
113	10/19/04	Check for \$18,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
114	10/20/04	Check for \$28,500.00 (lulling payment)	Citibank, Dublin, CA	Family Home Lenders
115	10/25/04	Check for \$75,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Townsend Direct
116	10/25/04	Check for \$4,220.14 (lulling payment)	Citibank, Dublin, CA	Beneficial Mortgage
117	10/27/04	Check for \$10,630.09 (lulling payment)	Citibank, Dublin, CA	Washington Mutual

Count	Date	Transaction	From	To
118	11/3/04	Check for \$132,047.00 (DreamLife business expense)	Citibank, Dublin, CA	Law Firm A
119	11/4/04	Check for \$80,000.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
120	11/12/04	Check for \$75,000.00 (DreamLife business expense)	Citibank, Dublin, CA	Townsend Direct
121	11/12/04	Check for \$120,655.00 (DreamLife investment)	Citibank, Dublin, CA	DreamLife Financial
122	11/12/04	Bank transfer of \$17,900.00 (lulling payment)	Citibank, Dublin, CA	HSBC Bank

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(I).

Dated:

A TRUE BILL.

FOREPERSON

KEVIN V. RYAN
United States Attorney

MARK L. KROTOSKI
Chief, Criminal Division

(Approved as to form: _____)
AUSA MICHAEL LI-MING WANG